

Exhibit 4

HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

STEVE TEIXEIRA,

Plaintiff,

v.

MOZILLA CORPORATION a.k.a. M.F.  
Technologies, a California corporation; MOZILLA  
FOUNDATION, a California public benefit  
corporation; LAURA CHAMBERS and her marital  
community; WINIFRED MITCHELL BAKER and  
her marital community, and DANI CHEHAK and  
her marital community.

Defendants.

Case No. 2:24-cv-1032

**DEFENDANT DANI CHEHAK'S  
RESPONSES TO PLAINTIFF'S  
FIRST SET OF  
INTERROGATORIES AND  
REQUESTS FOR PRODUCTION**

TO: Plaintiff Steve Teixeira

AND TO: Plaintiff's Counsel of Record

Defendant Dani Chehak ("Defendant"), by and through their counsel of record, hereby responds to Plaintiff Steve Teixeira ("Plaintiff") First Set of Interrogatories and Requests for Production to Defendant Dani Chehak as follows:

**GENERAL OBJECTIONS AND DEFINITIONS**

The following General Objections shall be considered as made, to the extent applicable, in response to each of the Interrogatories and Requests, as if the General Objections were fully set forth in each such response, including those responses which also set forth specific objections.

1. Defendant objects to each Interrogatory and Request to the extent that it seeks to

1 impose obligations beyond those set forth by the Federal Rules of Civil Procedure.

2       2. Defendant objects to each Interrogatory and Request to the extent that it calls for  
3 the production of documents or information containing trade secrets, proprietary information,  
4 confidential information and other competitively sensitive business or commercial information.

5       3. Defendant objects to each Interrogatory and Request to the extent that it seeks  
6 privileged documents or privileged information, including, without limitation, documents or  
7 information that were prepared, generated, or received for or in anticipation of litigation,  
8 documents or information that constitute attorney work product, or documents or information that  
9 is protected by a claim of privilege or immunity, including, without limitation, the attorney-client  
10 privilege, common interest or joint defense privilege, or any other applicable privilege or  
11 immunity. Such documents or information shall not be provided in response hereto, and  
12 inadvertent disclosure shall not be deemed a waiver of any privilege, immunity or protection.

13       4. Defendant objects to each Interrogatory and Request to the extent it is vague,  
14 ambiguous, compound, or does not describe the information sought with sufficient particularity.

15       5. Defendant's responses to Plaintiff's Interrogatories and Requests are based on  
16 information presently available to Defendant. Defendant reserves the right to supplement and/or  
17 amend these responses or to supply additional documents at a later time, if further information  
18 becomes available in the course of Defendant's diligent inquiries, through discovery or otherwise.  
19 These responses should not be construed as, and do not constitute a waiver of, Defendant's rights  
20 to prove additional facts at trial.

21       6. Defendant objects to each Interrogatory and Request to the extent it is unduly  
22 burdensome, oppressive, or harassing.

23       7. Defendant objects to each Interrogatory and Request to the extent that it is overly  
24 broad and not limited in time or scope.

25       8. To the extent that Defendant states that it will identify or produce documents  
26 responsive to the Requests, this is an indication that Defendant has used reasonable diligence to  
locate the requested documents it believes, in the exercise of reasonable business and technological

usage, are relevant, responsive, and non-privileged. To the extent Plaintiff required Defendant to do more than the foregoing, Defendant objects to each and every Request on the ground that it would subject Defendant to oppression, harassment, and undue burden.

#### **ANSWER TO INTERROGATORIES**

**INTERROGATORY NO. 1:** Identify all accounts including, but not limited to, email addresses, social media, phone numbers, blogs, etc, where you have communicated with or about Plaintiff.

#### **ANSWER TO INTERROGATORY NO. 1:**

Defendant objects to this Interrogatory on the grounds that it seeks information protected by the attorney-client privilege, work-product doctrine, and/or other applicable privileges. Defendant objects to this Interrogatory on the grounds that it seeks documents containing information pertaining to individuals, the disclosure of which would constitute a violation of any individual's right of privacy under Article I, Section 7 of the Washington Constitution and/or any other constitutional, statutory, or common law right of privacy. Defendant also objects to this Interrogatory as overly broad, unduly burdensome, and not reasonably tailored or proportional to the needs of this case insofar as it seeks information that is not relevant to any party's claims or defenses. Without waiving the objections, Defendant responds as follows:

**THE BELOW INFORMATION SHALL BE DESIGNATED AS  
"CONFIDENTIAL" UNDER THE PARTIES PROTECTIVE ORDER:**

Phone: 650-353-0596

Social Media/Blogs: None

Email: [dchehak@mozilla.com](mailto:dchehak@mozilla.com); [chehaks@mac.com](mailto:chehaks@mac.com) (this email has only been used in relation to Plaintiff to communicate with counsel regarding this case, so any potentially responsive information contained in such account is privileged).

#### **RESPONSE TO REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 1:** All Communications that mention or relate to Plaintiff from May 1, 2022 to the present in each account listed in response to Interrogatory No. 1, excluding accounts associated with your employment with Mozilla.

**RESPONSE TO REQUEST NO. 1:**

Defendant objects to this Request as overly broad, unduly burdensome, and not reasonably tailored or proportional to the needs of this case insofar as it seeks information that is not relevant to any party's claims or defenses. In particular, communications that merely mention or relate to Plaintiff are over encompassing and will not necessarily relate to claims or defenses. Defendant objects to this Request on the grounds that it seeks information protected by the attorney-client privilege, work-product doctrine, and/or other applicable privileges. Defendant also objects to this Request on the grounds that it seeks documents containing information pertaining to individuals, the disclosure of which would constitute a violation of any individual's right of privacy under Article I, Section 7 of the Washington Constitution and/or any other constitutional, statutory, or common law right of privacy. Without waiving the objections, Defendant responds as follows:

Defendant will agree to produce non-privileged communications in its possession to or from Defendant's non-Mozilla accounts that mention or relate to Plaintiff from May 1, 2022 to the present that contain search terms agreed to by Plaintiff and Defendant.

1 Dated this 10th day of September, 2024

2 DLA PIPER LLP (US)

3 By: s/ Anthony Todaro

4 Anthony Todaro, WSBA No. 30391

5 s/ Alexandria Cates

6 Alexandria Cates, WSBA No. 53786

7 701 Fifth Avenue, Suite 6900

8 Seattle, Washington 98104-7029

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10 E-mail: [anthony.todaro@us.dlapiper.com](mailto:anthony.todaro@us.dlapiper.com)

11 E-mail: [alexandria.cates@us.dlapiper.com](mailto:alexandria.cates@us.dlapiper.com)

12 *Attorneys for Defendants MOZILLA*

13 *CORPORATION a.k.a M.F.*

14 *TECHNOLOGIES, LAURA CHAMBERS,*

15 *WINIFRED MITCHELL BAKER, and*

16 *DANI CHEHAK*

**CERTIFICATION**


The undersigned attorneys for Defendant Dani Chehak have read the foregoing Interrogatories and Requests for Production, and Defendant's answers and responses thereto, and states that they are in compliance with applicable Federal Rules of Civil Procedure and the Local Rules of the Western District of Washington, this 10<sup>th</sup> day of September, 2024.

s/ Anthony Todaro

Anthony Todaro, WSBA No 30391  
Alexandria Cates, WSBA No. 53789  
Attorneys for Defendants Mozilla Corporation,  
Laura Chambers, Winifred Michell Baker, and  
Dani Chehak

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DECLARED this 9 day of September, 2024.

Signed by:   
BF-172DC29733463...  
**Dani Chehak**



**CERTIFICATE OF SERVICE**

I hereby certify that on September 10, 2024, I caused a true and correct copy of the foregoing to be served on the following in the manner indicated:

<p>Amy Alexander  Mathew Harrington  STOKES LAWRENCE, P.S.  1420 Fifth Avenue, Suite 3000  Seattle, WA 98101-2393  Telephone: (206) 626-6000  Fax: (206) 464-1496  <a href="mailto:Amy.alexander@stokeslaw.com">Amy.alexander@stokeslaw.com</a>  <a href="mailto:Mathew.Harrington@stokeslaw.com">Mathew.Harrington@stokeslaw.com</a>  <a href="mailto:laura.smith@stokeslaw.com">laura.smith@stokeslaw.com</a>  <a href="mailto:sarah.armon@stokeslaw.com">sarah.armon@stokeslaw.com</a>  <a href="mailto:Maricarmen.Perez-Vargas@stokeslaw.com">Maricarmen.Perez-Vargas@stokeslaw.com</a>  <a href="mailto:anna.armitage@stokeslaw.com">anna.armitage@stokeslaw.com</a></p> <p><i>Attorneys for Plaintiff Steve Teixeira</i></p>	<p><input type="checkbox"/> Via Hand Delivery</p> <p><input type="checkbox"/> Via U.S. Mail</p> <p><input checked="" type="checkbox"/> Via Email</p> <p><input type="checkbox"/> Via the Court's CM/ECF System</p>
<p>Darren A. Feider  Amanda V. Masters  SEBRIS BUSTO JAMES  15375 SE 30th Pl., STE 310  Bellevue, Washington 98007  <a href="mailto:dfeider@sbj.law">dfeider@sbj.law</a>  <a href="mailto:amasters@sbj.law">amasters@sbj.law</a>  <a href="mailto:epruzinsky@sbj.law">epruzinsky@sbj.law</a>  <a href="mailto:kmarchenko@sbj.law">kmarchenko@sbj.law</a></p> <p><i>Attorneys for Defendant Mozilla Foundation</i></p>	<p><input type="checkbox"/> Via Hand Delivery</p> <p><input type="checkbox"/> Via U.S. Mail</p> <p><input checked="" type="checkbox"/> Via Email</p> <p><input type="checkbox"/> Via the Court's CM/ECF System</p>

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Dated this 10th day of September, 2024.

s/ Jacey Bittle  
Jacey Bittle, Legal Administrative Assistant